

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

RAMON RODRIGUEZ,

Petitioner,

V.

MICHAEL CORSINI,

Respondent.

Civil Action No. 05-10843-NMG

**MOTION FOR EXTENSION OF TIME IN WHICH TO  
RESPOND TO PETITION FOR WRIT OF HABEAS CORPUS**

The respondent, Michael Corsini, through counsel, now appears and requests an extension of the time in which he must file a motion to dismiss or other responsive pleading in response to the petition for writ of habeas corpus for a period of thirty (30) days, up to and including January 27, 2006. In support of the motion, the respondent states that, pursuant to this Court's order, an answer or other responsive pleading is currently due to be filed by December 28, 2005. The undersigned assistant attorney general is still awaiting receipt of the state materials concerning the petitioner's conviction, which are necessary for counsel to review before formulating an appropriate response to the petition. Granting this motion will not unduly delay the proceedings in this matter, nor will it cause undue prejudice to any party.

WHEREFORE, the respondent respectfully requests that this Court grant him until January 27, 2006, to file a responsive pleading to the petition for writ of habeas corpus.

Respectfully submitted,

MICHAEL CORSINI,

By his attorneys,

THOMAS F. REILLY  
ATTORNEY GENERAL

/s/ Maura D. McLaughlin  
Maura D. McLaughlin (BBO # 634923)  
Assistant Attorney General  
Criminal Bureau  
One Ashburton Place  
Boston, Massachusetts 02108  
(617) 727-2200, ex. 2857

Dated: December 22, 2005

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and accurate copy of the foregoing document to be served upon the petitioner this 22nd day of December, 2005, by depositing a copy in the office depository for collection and delivery of first-class mail, addressed as follows: Ramon T. Rodriguez, Bay State Correctional Center, P.O. Box 73, Norfolk, Massachusetts 02056.

/s/ Maura D. McLaughlin  
Maura D. McLaughlin